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3/21/22

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

) No.

) **22-CR-156**

v.

) Violations: Title 18, United States

) Code, Sections 1201(a)(1) and

) 1201(c)

DRAKE BOOKER

)

) **UNDER SEAL**

COUNT ONE **Judge Harry D. Leinenweber**
Magistrate Judge Sheila M. Finnegan

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

1. Beginning no later than in or around the summer of 2018, and continuing until at least on or about August 23, 2018, at Chicago, in the Northern District of Illinois,

DRAKE BOOKER,

defendant herein, did conspire with Individual A, Individual B, and others known and unknown to the Grand Jury to knowingly and unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise another person, namely, Victim 1, and to use a means, facility, or instrumentality of interstate commerce in committing and in furtherance of the commission of the offense, in violation of Title 18, United States Code, Section 1201(a)(1).

2. It was part of the conspiracy that BOOKER agreed with his co-conspirators to abduct Victim 1 by pretending to be law enforcement officers who had authority to arrest Victim 1.

3. It was further part of the conspiracy that BOOKER and his co-conspirators agreed that, after they had abducted Victim 1, they would use force and the threat of force to compel Victim 1 to reveal where large quantities of cash, illegal narcotics, and other valuable items were located so that BOOKER and his co-conspirators could steal these items.

4. It was further part of the conspiracy that BOOKER and Individual A agreed to use firearms, handcuffs, a badge, a radio, and clothing, including a ballistics vest, to impersonate law enforcement officers while they were abducting Victim 1.

5. It was further part of the conspiracy that BOOKER and Individual A agreed to use a black Lincoln Navigator vehicle to confine and transport Victim 1 during the abduction.

6. It was further part of the conspiracy that BOOKER and his co-conspirators misrepresented, concealed, and hid, caused to be misrepresented, concealed and hid, and attempted to misrepresent, conceal, and hide the nature and purpose of their conspiracy.

Overt Acts

7. It was further part of the conspiracy that BOOKER and his co-conspirators committed one or more of the following acts, among others, in furtherance of and to effect the objects of the conspiracy:

a. On or about August 23, 2018, BOOKER and Individual A obtained a black Lincoln Navigator.

b. On or about August 23, 2018, BOOKER and Individual A traveled in a black Lincoln Navigator to the vicinity of 7400 South Dorchester Avenue in Chicago, Illinois.

c. On or about August 23, 2018, BOOKER handcuffed Victim 1 in the vicinity of 7400 South Dorchester Avenue in Chicago, Illinois.

d. On or about August 23, 2018, BOOKER forced Victim 1 into a black Lincoln Navigator in the vicinity of 7400 South Dorchester Avenue in Chicago, Illinois.

e. On or about August 23, 2018, Individual A placed a hood over Victim 1's head.

f. On or about August 23, 2018, BOOKER and Individual A drove Victim 1 away from the vicinity of 7400 South Dorchester Avenue in Chicago, Illinois; In violation of Title 18, United States Code, Section 1201(c).

COUNT TWO

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about August 23, 2018, at Chicago, in the Northern District of Illinois,

DRAKE BOOKER,

defendant herein, together with Individual A, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise another person, namely, Victim 1, and did use a means, facility, or instrumentality of interstate commerce, namely, a black Lincoln Navigator vehicle, in committing and in furtherance of the commission of the offense;

In violation of Title 18, United States Code, Section 1201(a)(1).

A TRUE BILL:

FOREPERSON

Signed by Amarjeet S. Bhachu
on behalf of the
UNITED STATES ATTORNEY